

**MAIDSTONE BOROUGH LOCAL PLAN EXAMINATION
SESSION 7 – RURAL SERVICE CENTRES (TUESDAY 08 NOVEMBER 2016)
WRITTEN STATEMENT ON BEHALF OF PERSIMMON HOMES**

Introduction

1. Persimmon Homes made a number of representations during the preparation of the draft Maidstone Borough Local Plan, covering several sites where they have an interest in residential development. These representations were either made by their in-house team or by planning consultants employed to promote the sites on their behalf. In the main, the representations made were broadly in support of the draft Local Plan and confirm that the sites are “deliverable” within the definition in the footnote to Paragraph 47 of the National Planning Policy Framework (NPPF).
2. JCN Design are retained by Persimmon Homes South East to promote their site at Grigg Lane, Headcorn (draft Policy H1(39)) through the preparation of the new Local Plan and to create an application for planning permission in accordance with the draft allocation to allow the site to be developed in the short term. The application for planning permission to create 55 no. two, three, four and five bedroom homes and associated roads, car parking, landscaping, vehicle access from Grigg Lane and a new area of public open space was formally acknowledged under reference 16/507035/FULL, with a target date for determination of 30 December 2016.

Spatial Strategy

Qn 7.1 If the level of housing identified in the Local Plan is confirmed at 18,560 (or a similar figure), what reasonable alternative strategy would be preferred by those who oppose the scale of housing development proposed at the rural service centres and why?

3. Persimmon Homes supports the scale of development in the borough’s rural service centres and at Headcorn in particular. The rural service centres are required to accommodate just under 11% of the total number of new homes to be built in the borough by 2031, meaning that residential development shared across the five villages will be relatively small in scale and therefore not out of keeping with the second tier of the settlement hierarchy. Residential development will help to improve the infrastructure in the rural service centres, strengthening their role as sustainable communities and maintaining the services currently available in the rural areas of the borough: Persimmon Homes agrees with the statement made at paragraph 5.44 of the draft plan and concurs that the rural service centres should act as the focal point for trade and services by providing a concentration of public transport networks, employment opportunities and community facilities that minimise car journeys. To shift a greater proportion of residential development to Maidstone will weaken the value of the rural service centres, whilst spreading new homes across smaller settlements is less sustainable and will increase the number of car journeys by leaving residents remote from existing facilities.

Headcorn

Qn 7.20 Is Policy SP7 a strategic policy with which the Neighbourhood Plan would be required to generally conform?

Qn 7.21 What effect would the requested deletion or modification of Policy SP7 and the relevant H1 policies have on the strategic housing supply objectives of the Local Plan?

4. There can be no doubt that Policy SP7 is a strategic policy, part of the spatial plan for the growth of the borough up to 2031. The role of the Local Plan is to define the strategic needs and priorities of the borough as a whole and then to plan positively to address them (paragraph 157 of the National Planning Policy Framework) – Headcorn is one of five rural service centres and therefore has an important role to play in helping to deliver a sustainable pattern of development, making development in the village integral to the borough-wide strategy. As such, for the draft Headcorn Neighbourhood Plan to pass through its own examination, it will need to be in general conformity with Policy SP7.
5. As noted above, the rural service centres have a role to play. As a proportion of the total residential development to be accommodated between 2011 and 2031, the 423 new homes allocated to Headcorn is small (2.3% of all residential development in the borough and 21.3% of the total allocated to the five rural service centres), therefore it is to be expected that Headcorn Parish Council are arguing that any shortfall created by deleting or modifying Policy SP7 can easily be made up elsewhere. However, it is the principle of additional development in the village that should be the focus of the question, not the actual numbers: Headcorn is one of five rural service centres and a sustainable location for development, therefore it is appropriate that the village takes a share of the strategic housing supply.
6. The objectively assessed housing need is established by the borough council's evidence base and in the case of Maidstone, the Strategic Housing Market Assessment is part of a wider study that also covers Ashford and Tonbridge & Malling – the borough-wide housing need has already been discussed as part of this examination. Headcorn and the four other rural service centres have their role to play in helping to address the identified need, with the Local Plan prepared positively to set out the strategic policies to deliver the new homes that are needed. To delete all housing allocations for Headcorn simply because they are not supported by the draft Neighbourhood Plan invites the other four rural service centres to do the same, quickly followed by any parts of Maidstone's urban area where allocations are not supported, meaning that the whole of the borough's settlement hierarchy and strategy to deliver homes to address the objectively assessed need will be undone at a stroke.
7. There is no objectively assessed need for housing in Headcorn alone and the draft Neighbourhood Plan exists within a system where it must be in general conformity with the strategic policies of the Local Plan, which includes the principle of the rural service centres taking a little over 10% of the total number of new homes within the borough. As such, the Parish Council are not in a position to decide how many new homes, if any, will be allocated in Headcorn. In short, Policy SP7 is sound and therefore does not need to be deleted or modified.

Qn 7.22 Is the Policy SP7(4)(iii) requirement for public open space provision consistent with Policy DM22 and does the relationship between the Policies require modification or clarification?

8. Policy SP7 seeks the provision of 2.87 hectares of publicly accessible open space, although it does not specify the type of open space. Policy DM22 identifies five types of open space, with the level of provision defined by the number of hectares of open space required per 1000 people, together with a minimum area for the facility. However, the text that supports Policy SP7 includes no explanation as to how the figure of 2.87 hectares has been created or which of the five types of open space are sought. There is only one open space allocation for the village in the Local Plan, on the land controlled by Persimmon Homes, where there is a specific requirement for 1.18 hectares of natural/semi-natural open space. As such, clarification of the relationship between the policies is needed before it can be understood whether Policy SP7 needs to be modified.
9. As an aside, the land controlled by Persimmon Homes to the south of Grigg Lane that is subject to allocation H1(39) is the only significant outstanding housing allocation where planning permission has not been granted. As such, the provision of open space on all of the other allocations has already been considered through the development control process, therefore the Borough Council will be in a position to confirm how much open space has been delivered and whether the outstanding allocation for 1.18 hectares is all that is needed to meet the 2.87 hectares of open space provision to serve the whole village.

Qn 7.24 Is the H1(39) allocation for 55 dwellings sound?

10. The most recent representations made by Persimmon Homes proposed that the allocation be enlarged to accommodate more new homes and a larger area of open space (dated 18 March 2016, reference R19506), in line with the pre-application discussions at the time. Maidstone Borough Council did not choose to enlarge the allocation as part of pre-submission revisions to the Local Plan and an application for planning permission has now been made in accordance with the allocation – 55 dwellings and 1.18 hectares of natural/semi-natural space. Persimmon Homes concur with the point made by the Inspector in paragraph 2.9 of the agenda for the session: it is not the role of the Examination to seek to improve a plan if its policies are sound. As such, although a larger allocation would be preferred and could be used to deliver more homes and a greater area of open space, it is not an issue to be pursued through this Examination.
11. Persimmon Homes consider allocation H1(39) in its current form to be sound. In accordance with paragraph 182 of the National Planning Policy Framework, the allocation is sound because it is:
 - Positively prepared – the allocation is part of a strategy to meet the objectively assessed development and infrastructure requirements identified by the evidence base, promoting sustainable development by supporting a rural service centre as the focal point for trade and services through its concentration of public transport networks, employment opportunities and community facilities that minimise car journeys. Headcorn plays a small but important role in the council's borough-wide strategy, with the allocation as an important part of the strategy for Headcorn.

- Justified – the appropriateness of the borough-wide strategy and reasonable alternatives are being considered throughout this Examination, but the information submitted in support of the application for planning permission (reference 16/507035/FULL) confirms that residential and open space uses on the site should be considered in the context of the presumption in favour of sustainable development. The current application for planning permission is discussed in more detail below.
 - Effective – the allocation is deliverable in the short term (the site is ready to be developed as soon as planning permission is granted), with all new homes completed long before the Local Plan expires in 2031.
 - Consistent with national policy – the new homes and open space on the site are sustainable development, with the application for planning permission prepared in accordance with the National Planning Policy Framework. Full details of how the proposed scheme meets the requirements of the NPPF are set out in the Planning, Design and Access Statement submitted as part of the application for planning permission.
12. Other representations have sought the deletion of the allocation for a number of technical reasons (such as poor accessibility and inadequate foul drainage infrastructure) that are deemed to make residential development on the site unsound. With the submission of the application for planning permission to create 55 new homes and open space, a suite of technical appraisals has been created that confirm that there is no technical reason to oppose the development of the site.
13. The reports were completed in September 2016 and therefore have not been submitted by Persimmon Homes as part of representations with respect to the Local Plan. However, they are now available and an offer for them to be added to the information under consideration through this Examination has been made to the Programme Officer. The findings can be summarised as follows:
- Arboricultural impact – the majority of the trees with the site are oaks and most are in a good condition. The proposed scheme requires that eight of the forty two trees within the site be removed (four to gain access from Grigg Lane and four to make efficient use of the land available for development), with tree protection measures specified for the others and new trees to replace those that will be lost.
 - Archaeology – agricultural activity is expected to have caused a moderate impact on buried archaeological deposits, therefore the site is anticipated to have a low archaeological potential.
 - Contamination and remediation – no special actions are required because of the low risk of contamination, mainly through the use of herbicides and pesticides as part of the agricultural use.
 - Ecology and biodiversity – the habitat offered by the existing site is considered to be common and widespread throughout the UK, with the grassland that covers most of the site found to be species poor. The trees around the edges of the site have some biodiversity value and are to be retained, alongside enhancement of the ditch along the western edge and enhancement of the grassland habitat with

wildflower mixtures. The erection of bat boxes is also recommended to provide new roosting opportunities, as the site has low potential for roosting and is suboptimal for foraging. The population of Great Crested Newts in the pond to the north west of the site is part of a wider network therefore the trees to the northern and western boundaries will be enhanced to act as cover and foraging habitat, alongside on-site enhancement works such as log piles, retention and protection of the ditch along the western edge, site-specific planting with native aquatic plants and the use of wildlife-friendly gully pot kerb stones.

- Energy – CO₂ emissions are reduced at the point of demand through a combination of fabric efficiency and highly efficient heating and ventilation systems, meeting the requirement of Policy DM2
- Flood risk and surface water drainage – the allocation only relates to land that is within Flood Zone 1 (low probability of flooding). Run-off from the developed site can be managed and reduced using flow control and attenuation techniques with the water discharged to the River Sherway at the current “greenfield” rate.
- Foul water drainage – as part of the pre-application discussions, Southern Water confirmed that there is capacity in the existing system to accommodate residential development on the site but strengthening works will be required to create resilience in the system. The works will be secured within the planning obligations as a community benefit and are expected to comprise a weir, a 1050mm diameter offline storage tank and flap valve added to the existing system under Locks Yard and Sherway Close, plus 110m³ of additional storage at the existing Headcorn Waste Water Treatment Works.
- Location – the site is on the eastern edge of the village, but is within walking distance of the village centre (upgraded in the Local Plan to a district retail centre in the post-submission revisions), the doctor’s surgery, the primary school and the railway station. Although other allocations are closer to the centre of the village, footway improvements secured through recent planning permissions and the network of back streets away from the A274 helps to create attractive routes for pedestrians, encouraging residents to leave their cars at home when making short journeys within the village.
- Noise – adequate noise levels can be achieved using standard glazing and trickle vents, with no concerns raised in respect of the horticultural uses to the east or the railway line and aerodrome to the south.
- Transport – less than one trip per dwelling in each peak hour is predicted, which equates to one extra car every two minutes in each direction. The cumulative impact of other development (both proposed and committed) within Headcorn and added to predicted growth to 2023 found that there would be no material impact on road capacity in the village or on the A274 between Headcorn and Maidstone. Planning obligations offered as part of the proposed scheme include a zebra crossing on Wheeler Street close to the entrance to the railway station, a parking stress survey to identify solutions to daytime on-street parking by commuters and cycle parking provision at the railway station and on the High Street.

- Visual impact – the baseline is neutral in the wider landscape and in the medium term the new homes will be screened and integrated in the Low Weald landscape by the planting scheme proposed in the application for planning permission, comprising hedges of locally native species and tree planting that is predominantly oaks.
14. With regard to the site not being included in the Neighbourhood Plan, representations have been made and it is hoped that Persimmon Homes will be invited to attend the examination of the plan.

Conclusion

15. Persimmon Homes support the designation of Headcorn as a rural service centre and believe that the village has an important role to play in the strategy for accommodating the objectively assessed need for new homes within the borough. The failure of the Neighbourhood Plan to be drafted in general conformity with the borough council's strategic policies is unfortunate and has led to a number of issues being raised that suggest that the plan may not be the most appropriate strategy, even though they stem from the ambition of the neighbourhood being misaligned with the needs and priorities of the wider borough. There is nothing to suggest that Policy SP7 is unsound, or that deletion or modification is required to address issues relating to residential development.
16. With regard to allocation H1(39) in particular, the allocation is sound. An application for planning permission to create 55 new homes and 1.18 hectares of open space is currently being considered by Maidstone Borough Council under reference 16/507035/FULL, which confirms that the site is sustainable development, is deliverable in the short term and is consistent with national planning policy and emerging policy in the new Local Plan.

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17 October 2016